

# EXHIBIT A

Proposed Depo Dates  
8/20/2021

**MNAA/COLONIAL/AECOM PROPOSED DATES FOR DEPOSITIONS**

AUGUST 2021						
S	M	T	W	TH	F	SA
22	23	24	25	26	27	28
29	30 D. Jacobsen Prep Day	31 <b>Dan Jacobsen (Colonial) Atlanta for MNAA / Zoom for AECOM</b>				

Proposed Depo Dates  
8/20/2021

SEPTEMBER 2021						
S	M	T	W	TH	F	SA
	<i>D. Jacobsen Prep Day</i>	<b>Dan Jacobsen (Colonial) Atlanta for MNAA / Zoom for AECOM</b>	<b>1 Traci Holton (MNAA) Nashville</b>	<b>2</b>	<b>3 David Gibbs (MNAA) Nashville</b>	<b>4</b>
<b>5</b>	<b>6 LABOR DAY</b>	<b>7 Russell Shelton (TDOT) Nashville</b>	<b>8 Shane Hester (TDOT) Nashville</b>	<b>9 I. Rodrigues Prep Day</b>	<b>10 Igor Rodrigues (Colonial) Atlanta</b>	<b>11</b>
<b>12</b>	<b>13 GS OUT THIS WEEK</b>	<b>14 GS Out Frederick Miller Depo (TDOT) Nashville (CC has hard stop at 4:00)</b>	<b>15 GS, CC Out</b>	<b>16 GS, CC, JZ Out</b>	<b>17 GS, CC, JZ Out</b>	<b>18</b>
<b>19</b>	<b>20 Karen Hughes (TDOT) Knoxville</b>  (not confirmed with Witness)	<b>21 GS Out</b>	<b>22 Cody Mitchell Depo (AECOM) Nashville</b> (not confirmed with witness)	<b>23 JZ Out</b>	<b>24 JZ, GS Out</b>	<b>25</b>
<b>26</b>	<b>27 BD Out</b>  <b>Jim Avioli Prep Day</b>	<b>28 GS Out Jim Avioli Depo (Colonial) Roundtop, TX (subject to AECOM issue)</b>	<b>29 Jim Morinec AECOM Nashville</b> (not confirmed with witness)	<b>30 PD Out Kleinfelder's Fleming or Sanders (checking with Kleinfelder's counsel)</b>		

Proposed Depo Dates  
8/20/2021

OCTOBER 2021						
S	M	T	W	TH	F	SA
					1 Don Pozin Prep Atlanta	2
3	4 <b>Don Pozin MNA Atlanta</b>	5 GS, CC Out	6 BBS OUT	7 BBS OUT	8 JZ Out Gresham Depo (not confirmed)	9
10	11 Prep for White or Strickland	12 Chris White (Baton Rouge) or Donald Strickland (Tuscaloosa) (not confirmed)	13 Atkins Depo (not confirmed)	14 JZ Out Perry Sisk Prep	15 JZ Out <b>Perry Sisk Depo (Colonial) Atlanta</b>	16
17	18 CC out	19 CC and GS out  Prep for White or Strickland	20 Chris White (Baton Rouge) or Donald Strickland (Tuscaloosa) (not confirmed)	21 CC out  Olay Depo Prep	22 <b>Olay Saysanavong Depo (Colonial) Atlanta</b>	23
24 Kevin Raley Depo Prep	25 <b>BMD Out Kevin Raley Depo (Colonial) Atlanta</b>	26 Carla Pinckney Depo Prep	27 Carla Pinckney (Colonial) Atlanta (not confirmed with witness)	28 CC Out Ken Whatley (MNA)  (not confirmed with witness)	29 CC Out Michael Fulghum Depo (MNA) Nashville (not confirmed with witness)	30

Proposed Depo Dates  
8/20/2021

NOVEMBER 2021						
S	M	T	W	TH	F	SA
	1 CC out	2 MNAA 30(b)(6) Nashville	3 MNAA 30(b)(6) Nashville	4 JZ Out	5 CC out, JZ Out	6
7	8 Colonial 30(b)(6) Atlanta	9 Colonial 30(b)(6) Atlanta	10	11 AECOM 30(b)(6) Nashville	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

NOTE: MNAA DOES NOT AGREE TO SCHEDULING THE 30(B)(6) DEPOSITIONS IN NOVEMBER; THIS ISSUE REMAINS FOR DISCUSSION WITH THE COURT

31329011.6